



Advocates for Workplace Fairness

December 6, 2021

Via ECF:

The Honorable Lorna G. Schofield
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Re: Ulku Rowe v. Google LLC, Case No. 19-cv-08655 (LGS)(GWG)

Dear Judge Schofield:

We represent Plaintiff Ulku Rowe in the above-referenced matter. Pursuant to the parties' Stipulated Protective Order (ECF No. 23, the "Protective Order"), Plaintiff filed the following exhibits to her Motion for Summary Judgment and her Opposition to Defendant Google Inc.'s Motion for Summary Judgment under seal:

Exhibit Number:	Bates Number:	Exhibit Number:	Bates Number:
	Plaintiff's Response to Defendant's Rule 56.1 Statement	35	Shaukat Tr. Excerpts
	Plaintiff's Statement of Undisputed Facts Pursuant to Local Civil Rule 56.1	37	GOOG-ROWE-00017565.R
	Plaintiff's Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment and in Support of Plaintiff's Cross-Motion for Summary Judgment	40	GOOG-ROWE-00018015
	Declaration of Cara Greene in Opposition to Defendant's Motion for Summary Judgment and in Support of Plaintiff's Cross Motion for Summary Judgment	42	Breslow Tr. Excerpts
1	Grannis Tr. Excerpts	46	GOOG-ROWE-00060560-62
2	GOOG-ROWE-00061501-02	48	GOOG-ROWE-00022669-70
3	GOOG-ROWE-00061511-12	50	GOOG-ROWE-00056872
4	Lucas Tr. Excerpts	53	GOOG-ROWE-00019290
6	GOOG-ROWE-00017719	54	GOOG-ROWE-00034417
8	GOOG-ROWE-00059863, 75-76	56	GOOG-ROWE-00056473
9	GOOG-ROWE-P-00000780	57	GOOG-ROWE-00059503
13	GOOG-ROWE-00018014	59	GOOG-ROWE-00017401.RR

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14	GOOG-ROWE-00061918-19, 35	60	GOOG-ROWE-00017706.R-08.R
15	GOOG-ROWE-00063516, 28, 31	61	GOOG-ROWE-00078058
16	GOOG-ROWE-00061880, 83, 87-88, 90, 93	62	GOOG-ROWE-00053811.R
18	Rowe Tr. Excerpts	65	GOOG-ROWE-00017429
19	GOOG-ROWE-00019103-04.R, 106-108.R	67	GOOG-ROWE-00017439
20	GOOG-ROWE-00056318.R, 26-27.R, 33.R	68	GOOG-ROWE-00056994, 57001-02, 04
21	GOOG-ROWE-00058500	71	GOOG-ROWE-00017919
22	GOOG-ROWE-00054266	74	GOOG-ROWE-P-00000714
23	GOOG-ROWE-00017999	79	GOOG-ROWE-00056487
25	GOOG-ROWE-00059824-26	81	GOOG-ROWE-00017423
26	GOOG-ROWE-00063692	83	GOOG-ROWE- 00056975-76
27	GOOG-ROWE-00017920	86	GOOG-ROWE-00017556
28	GOOG-ROWE-00017918	90	GOOG-ROWE-00017731.RR
29	GOOG-ROWE-00017889-90	93	GOOG-ROWE-00017583
30	GOOG-ROWE-00017932-33	95	GOOG-ROWE-00056910
34	GOOG-ROWE-00054161-62	96	GOOG-ROWE-00017644

Although Plaintiff has filed these exhibits under seal in order to comply with the Protective Order entered into this matter,¹ she submits that the exhibits should be filed as part of the public record and not under seal, as Google has not shown good cause why the exhibits require the extraordinary protection of sealing. *See New York v. Actavis, PLC*, No. 14 Civ. 7473, 2014 WL 5353774, at *2-3 (S.D.N.Y. Oct. 21, 2014) (the party seeking to seal has the burden of demonstrating by specific, on the record facts the reason why sealing is appropriate); *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 121 (2d Cir. 2006) (explaining that there is a “strong presumption” against sealing of exhibits submitted for consideration in a summary judgment motion); *see also*, ECF No. 151 (Plaintiff’s Memorandum of Law in Opposition to Google’s Motion to Seal) (explaining why Google’s request to seal similar exhibits was without merit).

Were Google to file a letter or motion with this Court seeking to retain these exhibits under seal, Plaintiff respectfully requests that she be given an opportunity to respond.

Respectfully submitted,



Cara E. Greene

Encl.

cc: All counsel of record (by ECF)

¹ Plaintiff met and conferred with Defendant in an effort to determine which, if any, of Plaintiff’s intended exhibits marked Confidential by Defendant could be exempted from the Protective Order and filed publicly. Where the Parties could not reach a clear understanding, Plaintiff has filed those exhibits under seal in an abundance of caution.